

1 GIBSON, DUNN & CRUTCHER LLP
2 MARK A. PERRY (*pro hac vice*)
3 1050 Connecticut Avenue, N.W.
4 Washington, DC 11101
5 Telephone: 202.955.8500
6 mperry@gibsondunn.com

7 GIBSON, DUNN & CRUTCHER LLP
8 JEFFREY T. THOMAS (*pro hac vice*)
9 BLAINE H. EVANSON (*pro hac vice*)
10 JOSEPH A. GORMAN (*pro hac vice*)
11 CASEY J. MCCRACKEN (*pro hac vice*)
12 3161 Michelson Drive
13 Irvine, CA 92612-4412
14 Telephone: 949.451.3800
15 jtthomas@gibsondunn.com
bevanson@gibsondunn.com
jgorman@gibsondunn.com
cmccracken@gibsondunn.com

16 GIBSON, DUNN & CRUTCHER LLP
17 SAMUEL LIVERSIDGE (*pro hac vice*)
18 ERIC D. VANDEVELDE (*pro hac vice*)
19 333 South Grand Avenue
20 Los Angeles, CA 90071-3197
21 Telephone: 213.229.7000
22 sliversidge@gibsondunn.com
evandavelde@gibsondunn.com

23 *Attorneys for Defendant*
24 *Rimini Street, Inc.*

25 RIMINI STREET, INC.
26 DANIEL B. WINSLOW (*pro hac vice*)
27 6601 Koll Center Parkway, Suite 300
28 Pleasanton, CA 94566
Telephone: (925) 264-7736
dwinslow@riministreet.com

RIMINI STREET, INC.
JOHN P. REILLY (*pro hac vice*)
3993 Howard Hughes Parkway, Suite 500
Las Vegas, NV 89169
Telephone: (336) 908-6961
jreilly@riministreet.com

HOWARD & HOWARD ATTORNEYS PLLC
W. WEST ALLEN (Nevada Bar No. 5566)
3800 Howard Hughes Parkway, Suite 1000
Las Vegas, NV 89169
Telephone: (702) 667-4843
wwa@h2law.com

25 ORACLE USA, INC., et al.,
26 Plaintiffs,
27 v.
28 RIMINI STREET, INC., et al.,
Defendants.

CASE NO. 2:10-cv-00106-LRH-VCF
**RIMINI STREET, INC.'S MOTION
TO SEAL PORTION OF
DEMONSTRATIVES**

NOTICE OF MOTION AND MOTION

Pursuant to the Stipulated Protective Order governing confidentiality of documents entered by the Court on May 10, 2010 (ECF No. 55, “Protective Order”), Rules 5.2(e)–(f) and 26(c) of the Federal Rules of Civil Procedure, and Local Rule 10-5(b), Defendant Rimini Street, Inc. (“Rimini”) respectfully requests that the Court seal a small portion of Demonstrative #2 filed as part of Rimini’s Notice of Submission of Demonstratives.

Specifically, Demonstrative #2 contains a non-public hyperlink to an evidentiary video presentation titled “BengeDeclarationProcess2.0.mp4,” which was submitted in connection with Rimini’s Opposition to Oracle’s Motion for Order to Show Cause, and which describes Rimini’s proprietary processes. That video has been submitted to the Court previously pursuant to a Motion to Seal (ECF No. 1394), which has not yet been ruled on. Only Rimini, Oracle, and the Court have access to the unredacted link to the video.

Rimini respectfully requests that the link be sealed for the reasons stated in Rimini's prior motion to seal (ECF No. 1394). Sealing (*i.e.*, redacting) the link is necessary because if the link is not redacted, then any member of the public can view and use the link to access the video of Rimini's proprietary processes.

This motion to seal is narrowly tailored because the remainder of the demonstratives—other than the link—have been filed publicly without redactions.

Accordingly, Rimini respectfully requests that the Court grant leave to file under seal the portion of Demonstrative #2 (filed with Rimini's Notice of Submission of Demonstratives) that contains a link to the video describing Rimini's proprietary processes.

Dated: September 3, 2020

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Eric D. Vandevelde
Eric D. Vandevelde

*Attorneys for Defendant
Rimini Street, Inc.*